

# **EXHIBIT 3-B**

**Detail of Investor Deposits Into Donziger-controlled Bank Accounts (by Year and Investor)****Exhibit 3-B****Time Period: August 2004 through January 2018****ANNUAL SUMMARY**

Year	# of Deposits	Total Amount
2004	5	\$ 92,874.35
2005	18	165,621.34
2006	16	207,312.96
2007	10	1,999,911.36
2008	10	233,110.83
2009	10	217,414.62
2010	5	2,550,000.00
2011	7	1,179,486.18
2012	4	789,000.00
2013	4	447,000.00
2014	0	-
2015	0	-
2016	8	538,450.00
2017	3	237,490.00
<b>Total 2016-2018</b>		
<b>Total 2004-2018</b>		

**SUMMARY BY INVESTOR**

Investor	Amount
Magister Law	\$ 3,274,486.18
Russ DeLeon	1,750,000.00
Kohn, Swift & Graf	1,166,245.46
Torvia	714,000.00
Patton Boggs, LLP	430,000.00
Glenn J. Krevlin	
	208,480.00
George R Waters	202,000.00
Olswang LLP (Woodsford)	200,000.00
Orin Kramer	150,000.00
	137,490.00
	104,990.00
Michael Donziger	100,000.00
	99,990.00
Amazonia Recovery Limited	45,000.00
<b>Totals</b>	

#	Bank Name	Name on Account	Account #	Tx Date	Transaction Type	From	To	Amount
1	Chase	Steven R. Donziger	61-65	8/16/2004	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	\$ 31,397.37
2	Chase	Steven R. Donziger	61-65	10/18/2004	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
3	Chase	Steven R. Donziger	61-65	11/8/2004	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	12,692.39
4	Chase	Steven R. Donziger	61-65	11/22/2004	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
5	Chase	Steven R. Donziger	61-65	11/24/2004	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	3,784.59
<b>Subtotal - 2004</b>								<b>\$ 92,874.35</b>
6	Chase	Steven R. Donziger	52-65	1/19/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	27,000.00
7	Chase	Steven R. Donziger	52-65	2/3/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	2,818.21
8	Chase	Steven R. Donziger	52-65	2/16/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	3,879.95
9	Chase	Steven R. Donziger	52-65	2/16/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
10	Chase	Steven R. Donziger	52-65	2/18/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	488.70
11	Chase	Steven R. Donziger	52-65	4/14/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	1,240.00
12	Chase	Steven R. Donziger	52-65	4/14/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	4,216.98
13	Chase	Steven R. Donziger	52-65	4/14/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	5,685.30
14	Chase	Steven R. Donziger	52-65	4/14/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
15	Chase	Steven R. Donziger	52-65	6/23/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	910.60
16	Chase	Steven R. Donziger	52-65	6/23/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	3,393.06

**Detail of Investor Deposits Into Donziger-controlled Bank Accounts (by Year and Investor)****Exhibit 3-B****Time Period: August 2004 through January 2018**

#	Bank Name	Name on Account	Account #	Tx Date	Transaction Type	From	To	Amount
17	Chase	Steven R. Donziger	52-65	7/18/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	6,478.58
18	Chase	Steven R. Donziger	52-65	7/21/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
19	Chase	Steven R. Donziger	52-65	7/21/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
20	Chase	Steven R. Donziger	52-65	7/21/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
21	Chase	Steven R. Donziger	52-65	8/29/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	4,509.96
22	Chase	Steven R. Donziger	5365	12/1/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
23	Chase	Steven R. Donziger	5365	12/19/2005	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
<b>Subtotal - 2005</b>								<b>\$ 165,621.34</b>
24	Chase	Steven R. Donziger	5365	2/1/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	1,952.01
25	Chase	Steven R. Donziger	5365	2/1/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	6,026.37
26	Chase	Steven R. Donziger	5365	2/6/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	2,572.39
27	Chase	Steven R. Donziger	5365	4/11/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	468.39
28	Chase	Steven R. Donziger	5365	4/11/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	2,093.37
29	Chase	Steven R. Donziger	5365	4/11/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	3,287.28
30	Chase	Steven R. Donziger	5365	4/11/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	5,162.87
31	Chase	Steven R. Donziger	5365	4/11/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
32	Chase	Steven R. Donziger	5365	6/8/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	1,453.67
33	Chase	Steven R. Donziger	5365	6/8/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	3,651.98
34	Chase	Steven R. Donziger	5365	6/14/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	2,360.32
35	Chase	Steven R. Donziger	5365	6/14/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	5,367.24
36	Chase	Steven R. Donziger	5365	6/14/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	40,000.00
37	Chase	Steven R. Donziger	5365	8/28/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	7,156.46
38	Chase	Steven R. Donziger	5365	9/1/2006	Check deposit	Kohn, Swift & Graf	Steven R. Donziger	45,000.00
39	Chase	Steven R. Donziger	5365	11/30/2006	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	65,760.61
<b>Subtotal - 2006</b>								<b>\$ 207,312.96</b>
40	Chase	Steven R. Donziger	5365	2/26/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	9,284.09
41	Chase	Donziger & Associates	0218	3/23/2007	Wire Transfer	Russ DeLeon	Donziger & Associates	1,750,000.00
42	Chase	Steven R. Donziger	5365	5/18/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	13,629.31
43	Chase	Steven R. Donziger	5365	5/18/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,000.00
44	Chase	Steven R. Donziger	5365	5/18/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	90,000.00
45	Chase	Steven R. Donziger	5365	7/18/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	20,187.72
46	Chase	Steven R. Donziger	5365	8/13/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
47	Chase	Steven R. Donziger	5365	9/13/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	13,340.47
48	Chase	Steven R. Donziger	5365	10/22/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
49	Chase	Steven R. Donziger	5365	11/5/2007	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	28,469.77
<b>Subtotal - 2007</b>								<b>\$ 1,999,911.36</b>

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#	Bank Name	Name on Account	Account #	Tx Date	Transaction Type	From	To	Amount
50	Chase	Steven R. Donziger	5365	5/21/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	10,489.30
51	Chase	Steven R. Donziger	5365	5/21/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	45,000.00
52	Chase	Steven R. Donziger	5365	7/14/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
53	Chase	Steven R. Donziger	5365	8/5/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	24,004.50
54	Chase	Steven R. Donziger	5365	9/9/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	5,147.93
55	Chase	Donziger & Assoc.	0218	9/29/2008	Check Deposit	Kohn, Swift & Graf	Donziger & Associates	45,000.00
56	Chase	Steven R. Donziger	5365	10/28/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	14,313.25
57	Chase	Steven R. Donziger	5365	12/17/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	7,407.13
58	Chase	Steven R. Donziger	5365	12/17/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	9,248.72
59	Chase	Steven R. Donziger	5365	12/17/2008	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	42,500.00
<b>Subtotal - 2008</b>								<b>\$ 233,110.83</b>
60	Chase	Steven R. Donziger	5365	3/2/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	8,351.15
61	Chase	Steven R. Donziger	5365	3/2/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	15,713.54
62	Chase	Steven R. Donziger	5365	4/7/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
63	Chase	Steven R. Donziger	5365	5/12/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	18,363.28
64	Chase	Steven R. Donziger	5365	5/12/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
65	Chase	Steven R. Donziger	5365	7/20/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	44,986.65
66	Chase	Steven R. Donziger	5365	7/27/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	30,000.00
67	Chase	Steven R. Donziger	5365	8/19/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	5,000.00
68	Chase	Steven R. Donziger	5365	8/19/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	17,500.00
69	Chase	Steven R. Donziger	5365	10/9/2009	Check Deposit	Kohn, Swift & Graf	Steven R. Donziger	17,500.00
<b>Subtotal - 2009</b>								<b>\$ 217,414.62</b>
70	Chase	Donziger & Assoc.	0218	2/17/2010	Transfer	Orin Kramer	Donziger & Associates	150,000.00
71	Chase	Donziger & Assoc.	0218	3/10/2010	Transfer	Magister Law	Donziger & Associates	500,000.00
72	Chase	Donziger & Assoc.	0218	6/11/2010	Transfer	Magister Law	Donziger & Associates	250,000.00
73	Chase	Donziger & Assoc.	0218	8/17/2010	Transfer	Magister Law	Donziger & Associates	1,250,000.00
74	Chase	Donziger & Assoc.	0218	12/31/2010	Transfer	Patton Boggs, LLP	Donziger & Associates	400,000.00
<b>Subtotal - 2010</b>								<b>\$ 2,550,000.00</b>
75	Chase	Donziger & Assoc.	0218	2/24/2011	Deposit	Michael Donziger	Donziger & Associates	100,000.00
76	Chase	Donziger & Assoc.	0218	3/18/2011	Transfer	Patton Boggs, LLP	Donziger & Associates	30,000.00
77	Chase	Donziger & Assoc.	0218	6/16/2011	Transfer	Magister Law	Donziger & Associates	307,469.57
78	Chase	Donziger & Assoc.	0218	7/1/2011	Transfer	Magister Law	Donziger & Associates	115,000.00
79	Chase	Donziger & Assoc.	0218	8/19/2011	Transfer	Magister Law	Donziger & Associates	350,000.00
80	Chase	Donziger & Assoc.	0218	9/26/2011	Transfer	Magister Law	Donziger & Associates	27,016.61
81	Chase	Donziger & Assoc.	0218	11/15/2011	Transfer	Magister Law	Donziger & Associates	250,000.00
<b>Subtotal - 2011</b>								<b>\$ 1,179,486.18</b>

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#	Bank Name	Name on Account	Account #	Tx Date	Transaction Type	From	To	Amount
82	Chase	Donziger & Assoc.	0218	2/2/2012	Transfer	Magister Law	Donziger & Associates	225,000.00
83	Chase	Donziger & Assoc.	0218	5/18/2012	Transfer	Torvia	Donziger & Associates	380,000.00
84	Chase	Donziger & Assoc.	0218	11/23/2012	Deposit	Torvia	Donziger & Associates	180,000.00
85	Chase	Donziger & Assoc.	0218	11/23/2012	Deposit	Torvia	Donziger & Associates	4,000.00
<b>Subtotal - 2012</b>								<b>\$ 789,000.00</b>
86	TD Bank	Steven R. Donziger	427-7302265	2/25/2013	Wire Transfer	Torvia	Steven R. Donziger	150,000.00
87	TD Bank	Steven R. Donziger	427-7302265	4/4/2013	Wire Transfer	Amazonia Recovery Limited	Steven R. Donziger	45,000.00
88	TD Bank	Steven R. Donziger	427-7302265	10/10/2013	Wire Transfer	Olswang LLP (Woodsford)	Steven R. Donziger	200,000.00
89	TD Bank	Steven R. Donziger	427-7302265	10/28/2013	Wire Transfer	George R Waters	Steven R. Donziger	52,000.00
<b>Subtotal - 2013</b>								<b>\$ 447,000.00</b>
<b>Subtotal - 2014</b>								<b>\$ -</b>
<b>Subtotal - 2015</b>								<b>\$ -</b>
92	TD Bank	Steven R. Donziger	427-7302265	1/25/2016	Wire Transfer	George R Waters	Steven R. Donziger	50,000.00
93	TD Bank	Donziger & Assoc.	427-3938783	5/10/2016	Wire Transfer	[REDACTED] [1]	Donziger & Associates	74,990.00
94	TD Bank	Donziger & Assoc.	427-3938783	7/19/2016	Wire Transfer	[REDACTED] [1]	Donziger & Associates	104,990.00
95	TD Bank	Donziger & Assoc.	427-3938783	10/6/2016	Wire Transfer	[REDACTED] [1]	Donziger & Associates	143,490.00
96	TD Bank	Donziger & Assoc.	427-3938783	10/21/2016	Wire Transfer	[REDACTED] [1]	Donziger & Associates	99,990.00
97	TD Bank	Donziger & Assoc.	427-3938783	12/19/2016	Wire Transfer	[REDACTED] [1]	Donziger & Associates	64,990.00
<b>Subtotal - 2016</b>								<b>\$ 538,450.00</b>
98	TD Bank	Donziger & Assoc.	427-3938783	2/14/2017	Wire Transfer	George R Waters	Donziger & Associates	50,000.00
99	TD Bank	Donziger & Assoc.	427-3938783	2/21/2017	Wire Transfer	[REDACTED] [1]	Donziger & Associates	137,490.00
100	TD Bank	Donziger & Assoc.	427-3938783	12/11/2017	Wire Transfer	George R Waters	Donziger & Associates	50,000.00
<b>Subtotal - 2017</b>								<b>\$ 237,490.00</b>
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
<b>Subtotal - 2018</b>								<b>\$ [REDACTED]</b>
<b>Total - 2004 through June 2018</b>								<b>\$ [REDACTED]</b>

Note [1]: Five payments in 2016 and one in 2017 were paid through Lenczner Slaght Royce Smith.